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PUC DOCKET NO. 48785 SOAH DOCKET NO. 473-19-1265

JOINT APPLICATION OF ONCOR	§	BEFORE THE STATE OFFICERK
ELECTRIC DELIVERY COMPANY	§	and the second s
LLC AND AEP TEXAS, INC. TO	§	
AMEND A CERTIFICATE OF	§	• •
CONVENIENCE AND NECESSITY	§	OF
FOR THE DOUBLE CIRCUIT 345-KV	§	
TRANSMISSION LINE IN PECOS,	§	
REEVES, AND WARD COUNTIES	§	
(SAND LAKE – SOLSTICE CCN)	-	ADMINISTRATIVE HEARINGS

ALAN ZEMAN'S MOTION TO INTERVENE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE:

NOW COMES, ALAN ZEMAN, pursuant to Public Utility Commission ("PUC") Procedural Rules §§ 22.101, 22.102, 22.103 and 22.104, and files this Motion to Intervene in the above referenced proceeding, and in support thereof, respectfully shows the following:

I. AUTHORIZED REPRESENTATIVE

Attorneys Patrick L. Reznik, Cassie Gresham, and Shane D. Neldner pursuant to P.U.C. PROC. R. 22.101(a), hereby notice their appearance as counsel on behalf of Alan Zeman in the above-styled and numbered proceeding before the Public Utility Commission of Texas.

The name, address, and telephone number of Intervenor's authorized representatives is as follows:

Patrick L. Reznik
BRAUN & GRESHAM, PLLC
P.O. Box 1148
Dripping Springs, Texas 78620
512-894-5426 (telephone)

512-894-3405 (fax)

Email: preznik@braungresham.com

Alan Zeman requests that the Commission and all parties to this proceeding serve

copies of all notices, correspondence, pleadings, briefs, requests for information, and

other documents on said authorized representatives.

II. JURISDICTION

The Commission has jurisdiction over the parties and subject matter of this

proceeding pursuant to PURA § 37.053.

III. BASIS FOR INTERVENTION

Alan Zeman has a justiciable interest in this proceeding. Alan Zeman owns

property that may be directly impacted by one or more of the routes for Oncor Electric

Delivery Company LLC and AEP Texas Inc's ("Oncor & AEP") proposed transmission

line. Alan Zeman has been notified by Oncor & AEP that his property may be directly

affected, as that term is defined in P.U.C. PROC. R. 22.52 (a)(3), by the proposed

transmission line that is the subject of this docket. Alan Zeman, therefore, has standing to

intervene under P.U.C. PROC. R. 22.103(b)(2). The Motion to Intervene is filed within

45 days of the date Oncor and AEP filed their Application and therefore is timely under

P.U.C. PROC. R. 22.104(b). Alan Zeman requests that this Motion to Intervene be

granted and that he be recognized as a party.

IV. <u>ACKNOWLEDGEMENTS</u>

Alan Zeman acknowledges: (1) he will be a party to the case; (2) he will be

required to respond to all discovery requests from other parties in the case; (3) if he files

testimony, other parties may cross-examine him at the hearing; (4) if he files any

documents in this case, copies of those documents will be served to every other party in

Motion to Intervene SOAH Docket No. 473-19-1265 this case, except where modified by alternative service procedures set out by order in this proceeding; and (5) he is bound by the Procedural Rules of the Public Utility Commission of Texas and the State Office of Administrative Hearings.

WHEREFORE, PREMISES CONSIDERED, Alan Zeman respectfully requests that this Motion to Intervene be granted, that he be allowed to participate in this proceeding as a party with all rights thereof to the full extent that he desires to do so, and for such further relief to which they may be entitled.

Respectfully submitted,

BRAUN & GRESHAM, PLLC

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ATTORNEYS FOR ALAN ZEMAN

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on November 20, 2018 in accordance with Public Utility Commission Procedural Rule

22.74.

atrick L. Reznik